

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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The Pullman Group, LLC,

Plaintiff,

Case No.: 1:20-cv-07293

-against-

Hon. Gregory H. Woods

Ronald Isley, Rudolph Isley, Reservoir Media Management, Inc., The Estate of O'Kelly Isley, J.R., Isley Brothers, L.L.C., Isley Brothers Royalty Venture I SPC, Inc., Three Boys Music Corporation, Bovina Music Inc., T-Neck Records, Inc., Triple Three Music, Inc. and John Doe Corporations 1-5,

NOTICE OF MOTION

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Memorandum of Law dated March 22, 2021, together with the supporting declaration of Joshua Levin-Epstein, Esq. and the exhibits annexed thereto, Plaintiff the Pullman Group LLC ("Pullman"), by and through their attorney Levin-Epstein & Associates, P.C. will move this Court, the Honorable Gregory H. Woods presiding, for an order: (i) awarding attorneys' fees, costs¹, and sanctions against the Isley Defendants², and their counsel, pursuant to Federal Rules of Civil Procedure ("Fed.R.Civ.P.") 26(g)(3) and 37(c)(1); (ii) compelling the Isley Defendants to produce documents concerning non-party witnesses Shukat and Geffen, (iii) compelling the Isley Defendants to supplement their

¹ Should the Court find favorably for Plaintiff, Plaintiff respectfully requests an opportunity to submit billing records for Plaintiff's attorneys' fees, costs and expenses.

² Defendants Ronald Isley ("Ronald"), Rudolph Isley ("Rudolph"), The Estate of O'Kelly Isley, J.R. (the "O'Kelly Estate"), Isley Brothers, L.L.C. ("Isley Brothers LLC"), Isley Brothers Royalty Venture I SPC, Inc. ("Royalty Venture"), Three Boys Music Corporation ("Three Boys"), Bovina Music Inc. ("Bovina"), T-Neck Records, Inc. ("T-Neck"), Triple Three Music, Inc. ("Triple Three") are collectively referred to herein as the "Isley Defendants."

responses to Plaintiff's interrogatories; and (iv) for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served on or before April 1, 2021, and Defendants' reply must be served on or before April 8, 2021, unless the Court shortens or extends these deadlines pursuant to Fed.R.Civ.P. 27(a)(3)(A).

Dated: New York, NY 10119
March 22, 2021

LEVIN EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein
Joshua D. Levin-Epstein, Esq.
60 East 42nd Street, Suite 4700
New York, NY 10165
Tel.: (212) 792-0046
Attorneys for Plaintiff

Cc: All parties via ECF